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August 9, 2021

BY ECF

Honorable Andrew L. Carter, Jr.
United States District Court for the
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: Ryan Stancu v. New York City/Parks Dept.
Civil Action No.: 20-CV-10371 (ALC)

Dear Judge Carter:

I am an Assistant Corporation Counsel in the office of Georgia M. Pestana, Corporation Counsel of the City of New York, attorney for the Defendant, New York City/Parks Dept. (hereinafter “Defendant”) in the above-referenced matter. Defendant write to respectfully request a thirty day (30) day enlargement of time from August 11, 2021 to September 30, 2021, to file its anticipated motion to dismiss. Defendant has sought *pro se* Plaintiff’s consent to the adjournment request, but have not received a response. The reason for the request is that the prior handling attorney is no longer with our office and the undersigned requires additional time to review the file and gather documents necessary to draft the motion to dismiss.

On July 9, 2021, Defendant filed a letter motion seeking an extension of time to file the motion to dismiss to August 11, 2021 due to the Defendants loss of internet access. *See* ECF Dkt. No. 19. Your Honor granted that request. At this time, Defendants seek another extension to file the motion to dismiss to September 10, 2021 because the undersigned was recently assigned as the new handling attorney of this matter and needs additional time in order to file the motion to dismiss.

Accordingly, Defendant respectfully request an enlargement of time until September 10, 2021 to file its motion to dismiss the amended complaint.

I thank the Court for its time and consideration in this matter.

Respectfully submitted,

/s/ **Ryan Nasim**
Ryan Nasim
Assistant Corporation Counsel

SO ORDERED:
Andrew L. Carter Jr.
HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

August 9, 2021

cc: **VIA EMAIL**

Ryan Stancu

Pro se Plaintiff

ryanstancu@yahoo.com